

# **EXHIBIT A**

**Querns, Ann E.**

---

**From:** Querns, Ann E.  
**Sent:** Tuesday, May 10, 2022 2:27 PM  
**To:** Querns, Ann E.  
**Subject:** FW: USA v. Nikparvar-Fard - Discovery

---

**From:** Bologna, Jason (USAPAE) <[Jason.Bologna@usdoj.gov](mailto:Jason.Bologna@usdoj.gov)>  
**Sent:** Wednesday, January 15, 2020 10:42 AM  
**To:** Scott, Syreeta - OIG <[scott.syreeta@oig.dol.gov](mailto:scott.syreeta@oig.dol.gov)>; Querns, Ann E. <[ann.querns@blankrome.com](mailto:ann.querns@blankrome.com)>  
**Subject:** RE: USA v. Nikparvar-Fard - Discovery

Ann,

Please see Syreeta's response, below. I think that resolves the discovery issues we discussed on the phone on Friday, January 10<sup>th</sup>. If not, please let me know.

Sincerely,  
Jason

---

**From:** Scott, Syreeta - OIG <[scott.syreeta@oig.dol.gov](mailto:scott.syreeta@oig.dol.gov)>  
**Sent:** Wednesday, January 15, 2020 10:37 AM  
**To:** Bologna, Jason (USAPAE) <[JBologna@usa.doj.gov](mailto:JBologna@usa.doj.gov)>  
**Subject:** RE: USA v. Nikparvar-Fard - Discovery

Hi Jason,

I reviewed Ann's email and our file. We do not have any additional substantive audio or video for the following:

- [REDACTED] November 17, 2014 visit.
- [REDACTED] July 18, 2013 visit (Please see DEA 6)
- [REDACTED] October 9, 2013 visit (Please see DEA 6)
- The date for the visit in Exhibit N3 ( Please see DEA 7A)

Also, the date for the visit in Exhibit N3 is October 9, 2013

Thank You  
Syreeta

---

**From:** Querns, Ann E. <[AQuerns@blankrome.com](mailto:AQuerns@blankrome.com)>  
**Sent:** Friday, December 06, 2019 4:57 PM  
**To:** Bologna, Jason (USAPAE) <[JBologna@usa.doj.gov](mailto:JBologna@usa.doj.gov)>  
**Cc:** Frank Desimone <[fdesimone2003@yahoo.com](mailto:fdesimone2003@yahoo.com)>; Poluka, Joseph G. <[POLUKA@BlankRome.com](mailto:POLUKA@BlankRome.com)>  
**Subject:** USA v. Nikparvar-Fard - Discovery

Hi Jason,

I hope you had a nice Thanksgiving! I wanted to touch based on some discovery issues. We want to confirm that we have all information related to confidential informants. For the below interactions, we think we are missing information based on what has been provided. For instance, we have documents related to these interactions but no video or visa versa.

- Substantive audio or video for [REDACTED] November 17, 2014 visit.
- Substantive audio or video for [REDACTED] July 18, 2013 visit
- Substantive audio or video for [REDACTED] October 9, 2013 visit
- The date for the visit in Exhibit N3

Also, while our motion requesting all the patient charts is pending, we would like to specifically request access to certain patient records. For each patient, we note the box in which the records should be found, which correlates to the Excel Spreadsheet provided by you, which is attached to this email:

- All patients in Box Number "HC"
- All patients in Box Number "992"

Name	DOB	Box Number
[REDACTED]	[REDACTED]	499
[REDACTED]	[REDACTED]	313
[REDACTED]	[REDACTED]	431
[REDACTED]	[REDACTED]	463
[REDACTED]	[REDACTED]	499
[REDACTED]	[REDACTED]	313
[REDACTED]	[REDACTED]	435
[REDACTED]	[REDACTED]	921
[REDACTED]	[REDACTED]	908

Let me know the best way to coordinate this. If you want us to send someone over to copy/scan things at your office or if there is a better way.

Have a great weekend.

Best,  
Ann

Ann E. Querns | BLANKROME

One Logan Square | 130 North 18th Street | Philadelphia, PA 19103

O: 215.569.5674 | F: 215.832.5674 | [aquerns@blankrome.com](mailto:aquerns@blankrome.com)

\*\*\*\*\*  
\*\*\*\*\*

This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the Blank Rome LLP or Blank Rome Government Relations LLC sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.

\*\*\*\*\*  
\*\*\*\*\*